

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD) (SN) ECF Case
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This document relates to:

Federal Insurance Co., et al. v. Al Qaida, et al., Case No. 03-cv-06978
Thomas Burnett, Sr., et al. v. Al Baraka Inv. & Dev. Corp., et al., Case No. 03-cv-09849
Kathleen Ashton, et al. v. Al Qaeda Islamic Army, et al., Case No. 02-cv-06977
Estate of John P. O'Neill, Sr., et al. v. Al Baraka, et al., Case No. 04-cv-01923
Continental Casualty Co., et al. v. Al Qaeda, et al., Case No. 04-cv-05970
Cantor Fitzgerald & Co., et al. v. Akida Bank Private Ltd., et al., Case No. 04-cv-07065
Euro Brokers, Inc., et al. v. Al Baraka, et al., Case No. 04-cv-07279

**DECLARATION OF J. SCOTT TARBUTTON TRANSMITTING DOCUMENTS IN
SUPPORT OF PLAINTIFFS' MOTION TO COMPEL DEFENDANTS WORLD
ASSEMBLY OF MUSLIM YOUTH-SAUDI ARABIA AND WORLD ASSEMBLY OF
MUSLIM YOUTH-INTERNATIONAL TO PRODUCE RESPONSIVE DOCUMENTS
PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 37(a)**

I, J. Scott Tarbutton affirm, under penalty of perjury, as follows:

1. I am an attorney admitted to practice *pro hac vice* in the above-captioned matter, and a member of the law firm Cozen O'Connor. I submit this Declaration to transmit to the Court the following documents submitted in support of Plaintiffs' Motion to Compel Defendants World Assembly of Muslim Youth-Saudi Arabia and World Assembly of Muslim Youth-International to Produce Responsive Documents Pursuant to Federal Rule of Civil Procedure 37(a).

2. Attached hereto as Exhibit 1 is a true and correct copy of Plaintiffs' First Set of Requests for Production of Documents Directed to the World Assembly of Muslim Youth-Saudi Arabia, dated December 10, 2010.

3. Attached hereto as Exhibit 2 is a true and correct copy of Plaintiffs' First Set of Requests for Production of Documents Directed to the World Assembly of Muslim Youth-International, dated December 10, 2010.

4. Attached hereto as Exhibit 3 is a true and correct copy of Plaintiffs' Second Set of Requests for Production of Documents Directed to the World Assembly of Muslim Youth-Saudi Arabia, dated October 28, 2011.

5. Attached hereto as Exhibit 4 is a true and correct copy of Plaintiffs' Third Set of Requests for Production of Documents Directed to the World Assembly of Muslim Youth-Saudi Arabia, dated July 31, 2012.

6. Attached hereto as Exhibit 5 is a true and correct copy of Plaintiffs' Fourth Set of Requests for Production of Documents Directed to the World Assembly of Muslim Youth-Saudi Arabia, dated August 22, 2013.

7. Attached hereto as Exhibit 6 is a true and correct copy of Plaintiffs' December 19, 2013 Motion to Compel letter brief.

8. Attached hereto as Exhibit 7 is a true and correct copy of Plaintiffs' February 14, 2014 Motion to Compel reply letter brief.

9. Attached hereto as Exhibit 8 is a true and correct copy of Plaintiffs' March 14, 2014 Motion to Compel letter brief.

10. Attached hereto as Exhibit 9 is a true and correct copy of Plaintiffs' April 15, 2014 Motion to Compel reply letter brief.

11. Attached hereto as Exhibit 10 is a true and correct copy of Plaintiffs chart titled *WAMY's General Secretariat/Board of Trustees – Missing Reports*.

12. Attached hereto as Exhibit 11 is a true and correct copy of WAMYSA051692-98, including an English translation.

13. Attached hereto as Exhibit 12 is a true and correct copy of WAMYSAE001124-33, including an English translation.

14. Attached hereto as Exhibit 13 is a true and correct copy of WAMYSA001764-68.

15. Attached hereto as Exhibit 14 is a true and correct copy of WAMYSA001785, 1865-72, 1885-87, 1889, and 4443.

16. Attached hereto as Exhibit 15 is a true and correct copy of Plaintiffs chart titled *WAMY Overseas Branch Office Annual Reports*.

17. Attached hereto as Exhibit 16 is a true and correct copy of the Declaration of Mutaz Saleh Abu Unuq, Financial Director of the World Assembly of Muslim Youth, dated April 1, 2003.

18. Attached hereto as Exhibit 17 is a true and correct copy of Plaintiffs chart titled *Statements by WAMY Senior Leaders Urging Financial and Material Support for Terrorist Groups*.

19. Attached hereto as Exhibit 18 is a true and correct copy of WAMYSA051643-54, including an English translation.

20. Attached hereto as Exhibit 19 is a true and correct copy of WAMYSAE001045-52, and 1056.

21. Attached hereto as Exhibit 20 is a true and correct copy of the Declaration of Saleh Al-Wohaibi, dated October 30, 2005.

22. Attached hereto as Exhibit 21 is a true and correct copy of the Transcript of Record for the February 19, 2014 hearing before U.S. Magistrate Judge Frank Maas.

23. Attached hereto as Exhibit 22 is a true and correct copy of WAMYSA09713, 29462, and 57745-51.

24. Attached hereto as Exhibit 23 is a true and correct copy of the Second Superseding Indictment, *United States v. Enaam M. Arnaout*, Case No. 1:02-cr-00892, filed January 22, 2003.

25. Attached hereto as Exhibit 24 is a true and correct copy of the January 5, 2012 letter from Cathy Hawara, Director General, Charities Directorate, Canada Revenue Agency, to Ayman al Taher, President of the World Assembly of Muslim Youth's Canada office, with attachments.

26. Attached hereto as Exhibit 25 is a true and correct copy of an excerpt from the February 14, 2018 U.S. Department of Treasury Office of Foreign Assets Control Specially Designated Nationals and Blocked Persons List, including true and correct copies of WAMYSA057745, 57760, 61323 and KADI0222029 (including an English translation).

27. Attached hereto as Exhibit 26 is a true and correct copy of the Affidavit of Abdullah Awad Binladin, dated November 19, 2005.

28. Attached hereto as Exhibit 27 is a true and correct copy of the February 13, 2018 letter from Omar T. Mohammedi, Esq., to Sean Carter, Esq.

29. Attached hereto as Exhibit 28 is a true and correct copy of WAMYSA2444 and 2973, including English translations.

30. Attached hereto as Exhibit 29 is a true and correct copy of WAMYINTLE001405.

31. Attached hereto as Exhibit 30 is a true and correct copy of WAMYINTLE001366-70.

32. Attached hereto as Exhibit 31 is a true and correct copy of WAMYINTLE013864.

33. Attached hereto as Exhibit 32 is a true and correct copy of WAMY International, Inc.'s 1998 Return of Organization Exempt from Income Tax (Form 990).

34. Attached hereto as Exhibit 33 is a true and correct copy of WAMY International, Inc.'s 1999 Return of Organization Exempt from Income Tax (Form 990).

35. Attached hereto as Exhibit 34 is a true and correct copy of WAMY International, Inc.'s Annual Reports, submitted to the Commonwealth of Virginia, State Corporation Commission, for 1994-2002.

36. Attached hereto as Exhibit 35 is a true and correct copy of WAMYINTLE001502-04.

37. Attached hereto as Exhibit 36 is a true and correct copy of excerpted document indices produced by WAMY on March 23, 2012.

38. Attached hereto as Exhibit 37 is a true and correct copy of FED-PEC0218206 and 289619.

39. Attached hereto as Exhibit 38 is a true and correct copy of Federal Office of Criminal Investigation Expert Report Concerning the Area, Financial Investigations.

40. Attached hereto as Exhibit 39 is a true and correct copy of WAMYSA042103.

41. Attached hereto as Exhibit 40 is a true and correct copy of PEC-WAMY001144-1276.

42. Attached hereto as Exhibit 41 is a true and correct copy of WAMYSA167861, 189391, and 190249, including English translations.

43. Attached hereto as Exhibit 42 is a true and correct copy of WAMYSA341489, 341490-92, 341500-02, and 341503-05, including English translations.

44. Attached hereto as Exhibit 43 is a true and correct copy of WAMYSA01519, 30079-81, WAMYINTLE00249, and 15165, including English translations.

45. Attached hereto as Exhibit 44 is a true and correct copy of the November 18, 2011 letter from Sean P. Carter, Esq. to Omar T. Mohammedi, Esq.

46. Attached hereto as Exhibit 45 is a true and correct copy of the November 23, 2011 letter from Omar T. Mohammedi, Esq. to Sean P. Carter, Esq.

47. Attached hereto as Exhibit 46 is a true and correct copy of WAMYSA797930-35.

48. Attached hereto as Exhibit 47 is a true and correct copy of WAMYSA084452-84467.

49. Attached hereto as Exhibit 48 is a true and correct copy of WAMYSA084468-71.

50. Attached hereto as Exhibit 49 is a true and correct copy of WAMYSA336756-57, 336761, 336764, 336766, 336775-76, 336780.

51. Attached hereto as Exhibit 50 is a true and correct copy of WAMYSA295078-88.

52. Attached hereto as Exhibit 51 is a true and correct copy of WAMYSA1109602 and 1109647.

53. Attached hereto as Exhibit 52 is a true and correct copy of WAMYSA1090498.

54. Attached hereto as Exhibit 53 is a true and correct copy of WAMYSA304134.

55. Attached hereto as Exhibit 54 is a true and correct copy of Plaintiffs chart titled *WAMY-Missing Attachments*.

Executed in Philadelphia, Pennsylvania on February 28, 2018.

/s/_____
J. Scott Tarbutton, Esq.